

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF VISHESH NARAYEN IN SUPPORT OF DEFENDANT
GOOGLE LLC'S OPPOSITION TO PLAINTIFF'S MOTION TO EXCLUDE CERTAIN
DOCUMENTS AND TESTIMONY OF DR. MIRIAM LEESER DUE TO IPR ESTOPPEL**

I, Vishesh Narayen, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am an attorney at the law firm of Keker, Van Nest & Peters LLP. I represent Defendant Google LLC ("Google") in the above-captioned case.
2. Attached hereto as **Exhibit 1** is a true and correct copy of the December 22, 2022, Expert Report of Miriam Leeser, Ph.D. Regarding Invalidity, without accompanying exhibits.
3. Attached hereto as **Exhibit 2** is a true and correct copy of the March 3, 2023, Rebuttal Expert Report of Sunil P. Khatri, Ph.D. on the Validity of the Asserted Claims, without accompanying exhibits.
4. Attached hereto as **Exhibit 3** is a true and correct copy of an email chain between counsel for Google and counsel for Plaintiff Singular Computing LLC ("Singular"), spanning April 24-27, 2023.
5. Attached hereto as **Exhibit 4** is a true and correct copy of the file history of U.S. Patent No. 8,407,273 as produced by Singular in this case.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the file history of U.S. Patent No. 9,218,156 as produced by Singular in this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on May 19, 2023, in Tampa, Florida.



VISHESH NARAYEN

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed